

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEYED MOHSEN HOSSEINI-SEDEHY,

Plaintiff,

V.

ERIN T. WITHINGTON
and CITY OF BOSTON,

Defendants.

Civil Action No. 04-cv-11948-RGS

**SECOND ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO THE
SUFFOLK DISTRICT ATTORNEY’S OFFICE MOTION TO QUASH THE SUBPOENA**

Now comes Seyed Mohsen Hosseini-Sedehy (“Mr. Hosseini”), with the assent of counsel for the Suffolk District Attorney, and respectfully requests that this Court grant him an additional one week to respond to the Suffolk District Attorney’s Office Motion to Quash the Subpoena (the “Motion”) filed on Friday, June 3, 2005. As reasons therefore, Mr. Hosseini asserts that his counsel is currently in the hospital and has been ill since Monday, June 13, which necessitated the first extension. As a result of his continued hospitalization, we now need a second extension, and expect counsel out of the hospital this weekend. An additional one week time will permit Mr. Hosseini an adequate opportunity to prepare an opposition to the motion.

Wherefore, Mr. Hosseini asks that his request for additional time to file an opposition to the motion be allowed.

Local Rule 7.1(A)(2) Certification

The undersigned certifies that Christopher A. Duggan has conferred in good faith with counsel for Suffolk District Attorney's Office pursuant to Local Rule 7.1(A)(2) and was able to agree on this issue.

Respectfully submitted,
Seyed Mohsen Hosseini-Sedehy
By his attorneys,

/s/ Gerard A. Butler, Jr.
Christopher A. Duggan
BBO # 544150
Gerard A. Butler, Jr.
BBO # 557176
Smith & Duggan LLP
Lincoln North
55 Old Bedford Road
Lincoln, MA 01773-1125
(617) 228-4400

Date: June 23, 2005

CERTIFICATE OF SERVICE

I, Gerard A. Butler, Jr., hereby certify that I have caused a copy of the **SECOND ASSENTED-TO MOTION TO EXTEND TIME TO RESPOND TO THE SUFFOLK DISTRICT ATTORNEY'S OFFICE MOTION TO QUASH THE SUBPOENA** to be served via first-class mail, postage prepaid, to counsel of record as listed below.

Amy E. Ambarik
City of Boston Law Department
Boston City Hall, Room 615
1 City Hall Plaza
Boston, MA 02201

Eva M. Badway
Assistant Attorney General
Office of the Attorney General
Criminal Bureau
One Ashburton Place
Boston, MA. 02108

/s/ Gerard A. Butler, Jr.
Gerard A. Butler, Jr.
BBO No. 557176

Date: June 23, 2005